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5 Attorneys for Defendants
6 COUNTY OF SANTA CLARA, ASBAN,
7 RODRIGUEZ, DURAN AND WHEELER

8
9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 (SAN JOSE)

12 KAREN CARTER,) No. C05 03974 JF
13 Plaintiff,)
14 v.) **STIPULATION AND PROTECTIVE
15 THE COUNTY OF SANTA CLARA, et al.,) ORDER**
16 Defendants.)
17 _____)

18 Plaintiff Karen Carter (hereafter "Plaintiff"), and Defendants County of Santa Clara,
19 Asban, Rodriguez, Duran and Wheeler (hereafter "Defendants") stipulate to the following terms
20 and conditions respecting specifically designated and/or marked documents and items produced
in this litigation by the Defendants, in response to Plaintiff's discovery requests:

21 1. It is agreed that Plaintiff will restrict access to all documents and items - marked
22 "DOC CONFIDENTIAL" by the Defendants, and all information contained therein - to the
23 following individuals: Plaintiff, Plaintiff's attorneys (including staff), and litigation consultants;

24 2. Nothing contained herein shall prohibit counsel for the Plaintiff and the
25 Defendants from using or referring to the marked documents or items in motion papers or
26 pleadings filed with the Court in this action. If marked documents or items subject to this
27 protective order are contained within or attached to any pleading, Defendants will have the right
28 to move that any pleading be sealed pursuant to Court Order;

3. Where permitted by the rules of evidence, the marked documents or items may be exhibited to witnesses during the trial or pretrial proceedings in this action provided, however, that to the extent that the transcript of any trial or pretrial proceeding or the exhibits thereto incorporate or reference the documents or items, such transcript and any such exhibits may be sealed in accordance with the Court's rules and procedures upon application therefore by the Defendants;

4. Upon case disposition, Plaintiff agrees to dispose of all of the documents and items (and all duplicates and/or copies thereof) or return same to the Defendants;

5. If there is any unauthorized disclosure of any documents or items subject to this Order by any person or entity, said person or entity may be subject to sanctions and civil contempt for violation of this Order, in accordance with the procedures of the Court; and

6. This Order is subject to modification pursuant to written stipulation between the parties and/or appropriate motion procedures. 

Dated: Jan. 10, 2007

By:

MICHAEL ACKERMAN
Attorneys for Plaintiff

Dated: December 20, 2006

ANN MILLER RAVEL
County Counsel

By:

DAVID M. ROLLO
Deputy County Counsel

Attorneys for Defendants
COUNTY OF SANTA CLARA, ASBAN,
RODRIGUEZ, DURAN AND
WHEELER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: January 18, 2007

62150 wnd

Robert Schenck

RICHARD SEEBORG
U.S. Magistrate Judge